

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

Case No.: 9:24-cv-80382-MD

LAKISHA C. SYKES,

Plaintiff,

v.

THE CREDIT PROS INTERNATIONAL, LLC,

Defendant.

JOINT SCHEDULING REPORT

(A) The likelihood of settlement; **The Parties have not had the opportunity to discuss settlement as Defendant's counsel recently filed his appearance on May 3, 2024 [see D.E. 10]. Nevertheless, Plaintiff will make a settlement demand to Defendant in the next seven (7) days.**

(B) The likelihood of appearance in the action of additional parties; **None at this time.**

(C) proposed limits on the time:

(i) To join other parties and to amend the pleadings: **June 12, 2024.**

(ii) To file and hear motions: **February 21, 2025.**

(iii) To complete discovery: **January 17, 2025.**

(D) Proposals for the formulation and simplification of issues, including the elimination of frivolous claims or defenses, and the number and timing of motions for summary judgment or partial summary judgment; **None at this time.**

(E) The necessity or desirability of amendments to the pleadings; **The Parties propose June 12, 2024, as a deadline to amend the pleadings, if necessary.**

(F) The possibility of obtaining admissions of fact and of documents, electronically stored information or things which will avoid unnecessary proof, stipulations regarding authenticity of

documents, electronically stored information or things, and the need for advance rulings from the Court on admissibility of evidence; **The Parties agree to exchange information via discovery without the need for advanced rulings.**

(G) Suggestions for the avoidance of unnecessary proof and of cumulative evidence; **None.**

(H) Suggestions on the advisability of referring matters to a Magistrate Judge or master; **The Parties do not consent to a Magistrate Judge.**

(I) A preliminary estimate of the time required for trial; **1-2 days**

(J) Requested date or dates for conferences before trial, a final pretrial conference, and trial;
Conference before trial: April 21, 2025.

Final pretrial conference: May 21, 2025.

Trial: May 26, 2025

(K) Any issues about:

(i) Disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced; **The Parties agree to produce ESI in original format and/or .PDF if original format is not relevant.**

(ii) Claims of privilege or of protection as trial-preparation materials, including - - if the parties agree on a procedure to assert those claims after production -- whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502; and **The Parties propose to file a motion for protective order prior to producing privilege materials.**

(iii) When the parties have agreed to use the ESI Checklist available on the Court's website (www.flstd.uscourts.gov), matters enumerated on the ESI Checklist; and **The Parties will agree to use the ESI Checklist.**

(L) Any other information that might be helpful to the Court in setting the case for status or pretrial conference. **None at this time.**

DATED: May 15, 2024

/s/ Alexander J. Taylor
Alexander J. Taylor, Esq.
Florida Bar No. 1013947
Sulaiman Law Group, Ltd
2500 S Highland Ave, Suite 200
Lombard, Illinois 60148
Telephone: (630) 575-8181
ataylor@sulaimanlaw.com
Counsel for Plaintiff

Respectfully submitted,

/s/ Jamey R. Campellone
Lawren A. Zann, Esq.
Florida Bar No. 42997
Jamey R. Campellone, Esq.
Florida Bar No. 119861
Greenspoon Marder LLP
200 East Broward Blvd., Suite 1800 Fort
Lauderdale, Florida 33301
Telephone: (954) 527-6296
lawren.zann@gmlaw.com
gabby.mangar@gmlaw.com
jamey.campellone@gmlaw.com
Counsel for Defendant